

**SCHIFF HARDIN LLP****Bruce A. Wagman, *Pro Hac Vice***[bwagman@schiffhardin.com](mailto:bwagman@schiffhardin.com)

Robert G. Engel, OSB #01176

[rengel@schiffhardin.com](mailto:rengel@schiffhardin.com)One Market, Spear Street Tower, 32<sup>nd</sup> Floor

San Francisco, CA 94105

(415) 901-8700

(415) 901-8701

**Craig J. Capon, OSB #98192**[craig.j.capon@harrang.com](mailto:craig.j.capon@harrang.com)**HARRANG LONG GARY RUDNICK P.C.**360 E. 10<sup>th</sup> Avenue, Suite 300

Eugene, OR 97401-3273

(541) 485-0220

(541) 686-6564

Of Attorneys for Plaintiffs

CHIMPS, INC., INTERNATIONAL PRIMATE

PROTECTION LEAGUE and MARGUERITE GORDON

## UNITED STATES DISTRICT COURT

## DISTRICT OF OREGON

**CHIMPS, INC., INTERNATIONAL  
PRIMATE PROTECTION LEAGUE, and  
MARGUERITE GORDON,****Plaintiffs,****v.****PRIMARILY PRIMATES, INC.****Defendant.****Case No. 07-6149-HO****DECLARATION OF MARGUERITE  
GORDON IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION TO DISMISS,  
OR IN THE ALTERNATIVE, TO  
CHANGE VENUE**

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I, Marguerite Gordon, declare as follows:

1. I have been involved since the early 1980s with animal protection organizations in

New Mexico. I run two private sanctuaries in New Mexico and have extensive experience with

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PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS,  
OR IN THE ALTERNATIVE, TO CHANGE VENUE**

animal rescue including livestock and companion animals. I make the statements here based on personal knowledge and could and would testify to same if called upon to do so.

2. When I was contacted about the longhorn steer in need of help at Primarily Primates, Inc. ("PPI"), I agreed to adopt, rescue and rehabilitate the longhorn steer.

3. When entering into the Animal Transfer Agreement with PPI's Receiver, I was agreeing to provide for lifetime care, housing, and medical expenses for the longhorn steer.

4. When entering into the Animal Transfer Agreement, I also agreed to pay for the costs of transport as well as any new construction required for the longhorn steer.

5. When I entered into my contract with PPI to save the longhorn steer, I believed I could be required to and would gladly pay more than \$100,000 to transport, care for, feed, and provide medical treatment for the steer.

6. When I contracted to provide lifetime care for the steer, I assumed the contract was worth at least \$100,000 to me.

7. Based on my lifelong dedication to protecting the lives of animals, I value the contract far in excess of \$100,000 to be sure the longhorn steer is protected for life.

I declare under penalty of perjury under the laws of the United States that these facts are true and correct and that this Declaration is executed this 31<sup>st</sup> day of August, 2007, at Santa Fe, New Mexico.

DATED: August 31, 2007

By:



Marguerite Gordon

s/ Bruce A. Wagman  
BRUCE A. WAGMAN  
*Pro Hac Vice*  
(415) 901-8700  
Attorney for Plaintiffs  
CHIMPS, INC., INTERNATIONAL PRIMATE  
PROTECTION LEAGUE, and MARGUERITE  
GORDON

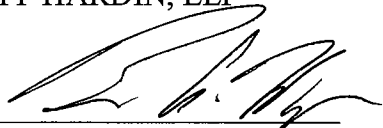
## CERTIFICATE OF SERVICE

I certify that on September 4, 2007, I served or caused to be served a true and complete copy of the foregoing **DECLARATION OF MARGUERITE GORDON IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS, OR IN THE ALTERNATIVE, TO CHANGE VENUE** on the party or parties listed below as follows:

- ☒ Via CM/ECF Filing
- ☐ Via First Class Mail, Postage Prepaid
- ☐ Via Facsimile
- ☐ Via Personal Delivery

William H. Sherlock  
Hutchinsom, Cox, Coons, DuPriest, Orr & Sherlock, P.C.  
777 High Street  
Eugene, OR 97401-2782  
Attorneys for Defendant  
Primarily Primates, Inc.

SCHIFF HARDIN, LLP

By:   
Bruce A. Wagman, *Pro Hac Vice*  
[bwagman@schiffhardin.com](mailto:bwagman@schiffhardin.com)  
Robert G. Engel, OSB #01776  
[rengel@schiffhardin.com](mailto:rengel@schiffhardin.com)  
Telephone: (415) 901-8700  
Facsimile: (415) 901-8701

HARRANG LONG GARY RUDNICK, P.C.  
Craig J. Capon, OSB #98192  
[craig.j.capon@harrang.com](mailto:craig.j.capon@harrang.com)

Of Attorneys for Plaintiffs  
CHIMPS, INC., INTERNATIONAL PRIMATE  
PROTECTION LEAGUE, and MARGUERITE  
GORDON